

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

FILED

MAY - 2 2016

DAVID OWENS, CLERK
BY [Signature]
Deputy

JACK B. WILSON

Plaintiff

v.

Wexford Health Sources
Centurion of MS.
M.D.O.C.

MR. CHRIS EPPS Defendant

CASE NO.

4:16CV91-SA-JMV

PRISONER'S COMPLAINT CHALLENGING CONDITIONS OF CONFINEMENT

1. The Plaintiff's full legal name, the name under which the Plaintiff was sentenced, the Plaintiff's inmate identification number, the Plaintiff's mailing address, and the Plaintiff's place of confinement are as follows:

A. Legal name:

JACK B WILSON

B. Name under which sentenced:

11 11 11

C. Inmate identification number:

44582

D. Plaintiff's mailing address (street or post office box number, city, state, ZIP):

UNIT 26-A-B-Zone Bed 104
PARCHMAN, MS. 38738

E. Place of confinement:

PARCHMAN

2. Plaintiff names the following person(s) as the Defendant(s) in this civil action:

Name:

Wexford Health Sources

Title (Superintendent, Sheriff, etc.):

CEO & President

Defendant's mailing address (street or post office box number, city, state, ZIP)

FOSTER PLAZA 2/425 HOLIDAY DR.
PITTSBURG, PA. 15220

ND MISS. FORM P3, COMPLAINT CHALLENGING CONDITIONS OF CONFINEMENT (4/00)

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Name: CENTURION OF MS.
 Title (Superintendent, Sheriff, etc.): Willie Knighten, Site Manager
 Defendant's mailing address (street or post office box number, city, state, ZIP) UNIT 42 HOSPITAL
PARCHMAN, MS. 38738

Name: Commissioner Fisher
 Title (Superintendent, Sheriff, etc.): M.D.O.C.
 Defendant's mailing address (street or post office box number, city, state, ZIP) 633 NORTH STATE STREET
JACKSON, MS. 39202

Name: MR Epps
 Title (Superintendent, Sheriff, etc.): Former Commissioner, M.D.O.C.
 Defendant's mailing address (street or post office box number, city, state, ZIP) UNK. / c/o. U.S. DISTRICT COURT
501 E. COURT ST. Room 6-750, Jackson
MS. 39201

(If additional Defendants are named, provide on separate sheets the complete name, title, and address information for each. Clearly label each additional sheet as being a continuation of Question 2).

3. Have you commenced other lawsuits in any other court, state or federal, dealing with or pertaining to the same facts that you allege in this lawsuit or otherwise relating to your imprisonment? ☒ Yes ☐ No
4. If you checked "Yes" in Question 3, describe each lawsuit in the space below. If there is more than one lawsuit, describe the additional lawsuit(s) on separate sheets of paper; clearly label each additional sheet as being a continuation of Question 4.

A. Parties to the lawsuit:

Plaintiff(s):

Defendant(s):

B. Court:

C. Docket No.:

D. Judge's Name:

E. Date suit filed:

F. Date decided:

G. Result (affirmed, reversed, etc.):

5. Is there a prisoner grievance procedure or system in the place of your confinement? ☒ Yes ☐ No
6. If "Yes," did you present to the grievance system the same facts and issues you allege in this complaint? (See question 9, below). ☒ Yes ☐ No
7. If you checked "Yes" in Question 6, answer the following questions:

ND MISS. FORM P3, COMPLAINT CHALLENGING CONDITIONS OF CONFINEMENT (4/00)

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A. Does the grievance system place a limit on the time within which a grievance must be presented?



Yes



No

B. If you answered "Yes," did you file or present your grievance within the time limit allowed?



Yes



No

C. The court must find that you exhausted the prison's grievance system and administrative remedies before it can consider this Complaint. State everything you did to present your grievance(s). Be specific. Include the date(s) on which you filed or presented your grievances to prison officers; identify the officer(s). State your claim(s) exactly.

I File Two A.R.P. before I went To Court.

I ASKED A MOTION FOR TWO COURT ORDER'S. I ASKED IN AN AMENDMENT FOR A NEW CT SCAN WITH TISSUE SAMPLE AND FOR THE LAST (6) CT SCANS.

D. State specifically what official response your grievance received. If the prison provides an administrative review of the decision on your grievance, state whether you applied for that review and what the result was.

I Apply For The BOTH A.R.P. WAS Rule AGAINST me.

Special Note: Attach to this Complaint as exhibits complete copies of all requests you made for administrative relief through the grievance system, all responses to your requests or grievances, all administrative appeals you made, all responses to your appeals, and all receipts for documents that you have.

8. If you checked "No" in Question 6, explain why you did not use the grievance procedures or system:

N/A

9. Write below, as briefly as possible, the facts of your case. Describe how each Defendant is involved. Write the names of all other persons involved. Include dates and precise places of events. Do not give any legal argument or cite any legal authority. If you have more than one claim to present, number each claim in a separate paragraph. Attach additional pages only if necessary; label attached pages as being continuations of Question 9.

I had (6) CTSCANS, which show I have Severe Asbestosis, mesothelioma, Cancer And A Large gallstone in my gall bladder And received No treatments.

PERSONS INVOLVED, DR. THOMAS ~~LEHMAN~~ LEHMAN, DR. FAULK, DR. SUM, AND R.N. LISA TUCKER, DR. GLORIA PERRY, Deputy Commissioner SPARKMAN, Commissioner MR CHRIS EPS, WEXFORD HEALTH SERVICES, FROM, PITTSBURGH, PA. HEALTH CARE PROVIDER... CONTRACTED BY MR CHRIS EPS.

I ALSO wrote A LETTER TO President Obama, AND send him, my AND a copy OF THE CASE.

I RECEIVED A LETTER FROM THE U.S. DEPT. OF JUSTICE, "which said" THE "WHITE HOUSE REferred YOUR LETTER TO President Obama" WHITE ^{HOUSE} CASE NUMBER 2014-0401. President Obama TO THE UNITED STATES DEPT. OF JUSTICE, TRIAL ATTORNEY, CIVIL RIGHTS DIVISION, ANIKA G ZIFA

Said, I ONLY filed CLASS ACTION LAW SUITE
NOT one FOR ONE PERSON, CLASSACTION ONLY

10. State briefly exactly what you want the court to do for you. Do not make legal arguments. Do not cite legal authority.

I would like A COURT ORDER For
A New CT SCAN WITH Tissue Sample OF my
Lungs.

I would ALSO would like The COURT ~~to~~
TO issue a COURT ORDER FOR THE LAST (5)
CT SCANS AT The Greenwood/Leflore Hospital,
IN Greenwood, MS.

I would like TO PRESS charges ON MR.
CHRIS Epps, AND OTHERS INVOLVED IN NOT BEING
TREATED AND FALsify RECORDS and CONSPIRACY.

This Complaint was executed at (location):

PARCHMAN, MS. 38738

and I declare or certify or verify or state under penalty of perjury that this Complaint is true and correct.

Date: 4-26-16

Jack B. Wilson #44582

Plaintiff's Signature

4-26-16

Jack B. Wilson #44582
UNIT-26-A-B-Zone Bed 104
PARCHMAN, MS. 38738

Federal Judge
Judge Henry T. Wingate
C/o SECRETARY, MS. SHEILA CHANCE McCLAVE
501 E. COURT ST. Room 6.750
JACKSON, MS. 39201

RE: PRESS CHARGES ON
MR. CHRIS EPPS, FOR
FALSIFY RECORDS

DEAR YOUR HONOR Judge Wingate
I WANT TO PRESS CHARGES ON
MR. CHRIS EPPS, FOR FALSIFY RECORDS here AT PARCHMAN,
FOR SEVERAL YEARS.

MR EPPS, WAS THE PRESIDENT OF
A.C.A. (AMERICAN CREDITATION ASSOCIATE) FOR THE
UNITED STATES.

HIS A.C.A. DIRECTOR FOR M.D.C.,
MS. CHAPMAN, did what he said to do when it
CAME TIME FOR THE INSPECTION FOR THE HOSPITAL,
here AT PARCHMAN.

MR EPPS, SIGN THE PAPERS SAYING
THE HOSPITAL, IS 100% APPROVED CLEANNESS, AND 100%
APPROVED FOR THE PROPER CARE FOR ALL THE

(2)

INmate's. S.I.R This is a Lie.

The CLARION-Ledger, Chris Joyner, did several ARTICAL, ABOUT PARCHMAN HOSPITAL.. MR. Epps, SAID, THAT we give ALL our INmate's, The BEST OF medical CARE. He SAID This Twice in one of The Newspaper ARTICAL. MR. Epps, is LIEING ABOUT THAT..

WEXFORD HEALTH Sources, WAS hired By By MR. Epps, in July 1, 2006 AND LEFT June 30, 2015, because of Kickbacks...

When Wexford, WAS hired There NAME WAS Wexford HEALTH service AND in The fall of 2008 They Change There Name ~~change~~ To Wexford Health Sources. They ARE From Pittsburgh, PA.

SIR, I had (6) CT SCANS FROM SEPT. 19, 2007 TO MARCH 31, 2010... The LAST (5) CT SCANS Where AT The GREENWOOD / Leflore HOSPITAL, GREENWOOD, MS, ...

Two DOCTORS, Resign because, They Would NOT LET me GET TREATMENTS.. DR FAULK, AND DR SUM..

I HAVE SEVERE ASBESTOSIS, MESOTHELIOMA, CANCER AND A LARGE GALLSTONE in my GALLBLADDER.

I PUT in for PAIN PILLS ON MARCH 10, 2010 AND WAS CHARGE \$ 6.00 AND The R.N.

③

PUT ON The medical slip, SAYING I HAVE CANCER AND WAS EXPOSE TO ASBESTOS, SEE EMR (ELECTRONIC MEDICAL RECORDS).

SIR, I WORKED FOR KELLOGG BROWN + ROOT AT DUPONT 1979-1980 AND CHEVRON, 1981 AS A PIPE FITER AND A PIPE INSULATOR, USING SEVERAL TYPES OF ASBESTOS MATERIAL, PLUS WHEN I WORKED ^{FOR} MAIN MAINTENANCE HERE AT PARACHMAN, IN 1999, I MIX UP OVER 300 BAGS OF CEMENT IN A ROUND CONCRET-MIXER, 3 BAGS AT A TIME WITH SAND AND GRAVEL, FOR (9) MONTHS AND THE FIRST (6) MONTHS I WAS NOT ALLOWED TO WEAR A DUST MASK. THAT CONTAIN ASBESTOS FIBERS

MY A.R.P. IS ENCLOSE WITH EVIDENCE. I FILE IN SUNFLOWER COURT IN 2007 - TWICE, WITH THE AMENDMENT AND JUDGE ~~ROD~~ RICHARD SMITH, RULED IN WEXFORD FAVOR.

I SENT PRESIDENT OBAMA, A COPY WITH A LETTER. I RECEIVED A LETTER FROM THE U.S. DEPT. OF JUSTICE, SAYING, "THE WHITE HOUSE HAS REFERRED YOUR LETTER TO PRESIDENT OBAMA," WHITE CASE NUMBER IS 2014-0401.

DEC. 6, 2014 I SENT A LETTER TO GOVERNOR RHP BRYANT AND RECEIVED A FAX MAIL FROM MY CASE MANGER, FROM MS. CHUNGA L.

④

JONES, CONSTITUENT SERVICE REPRESENTATIVE, ASKING, IF I CAN BE RELEASED ON MEDICAL, FOR THE FOLLOWING ILLNESSES, ASBESTOSIS, MESOTHELIOMA, AND A LARGE GALLSTONE IN MY GALLBLADDER; DR. GLORIA PERRY, IN JACKSON

ALSO ENCLOSE IS THE FIRST PAGE AND PAGE 18, OF A ~~BOOK~~ FEDERAL CASE LAW, "CRIMES BY HEALTH CARE PROVIDERS" ON PAGE 18 IS SECTION (8) CONSPIRACY. SIR, A LOT OF M.D.O.C OFFICIALS ARE GUILTY OF CONSPIRACY

SIR, I AM TRYING TO GET A NEW CT SCAN WITH TISSUE OF MY LUNGS AND THE LAST (5) CT SCANS FROM GREENWOOD/LEFLORE HOSPITAL, SO I CAN FILE AGAINST, HALLIBURTON, KELLOGG BROWN & ROOT, DII AND. AND DII ASBESTOS TRUST TO GET THE MILLIONS OWN TO ME SO, I CAN PAY FOR MY OWN TREATMENTS.

SIR, I DO PRAY AND HOPE YOU DO RECEIVED THIS LETTER AND ME PRESS CHARGES ON MR. CHRIS EPPS AND A.C.A. . . A LOT OF PEOPLE CAN BE INDICTED IF YOU WILL HELP ME.

MR CHRIS EPPS, RECEIVED A LOT MORE MONEY THEN WHAT WAS RECOVER, MILLIONS MORE, PLUS THE A.C.A. COMPLIANCE

⑤

OFFICER AS WELL.

THANKING YOU IN ADVANCE FOR
YOUR TIME IN THIS MATTER, & REMAIN

Sincerely

Jack B. Wilson #44582
UNIT-26-A-B-Zone Bed 104
PARCHMAN, MS. 38758



U.S. Department of Justice
Civil Rights Division

JMS:JA:ANG
WH 20140401-03732683
DJ 168-40-0

Special Litigation Section - PHB
250 Pennsylvania Ave, NW
Washington DC 20530

MAY 15 2014

Jack B. Wilson
#44582
Mississippi State Penitentiary
Unit 30-a Bldg.
P.O. Box 10
Parchman, MS 38738-0010

Dear Mr. Wilson:

The White House has referred your letter to President Obama to the Department of Justice. In your letter, you request assistance with your motion regarding cancer treatment that you filed in the Circuit Court of Sunflower County in Mississippi.

The Department of Justice's Civil Rights Division works to uphold the civil and constitutional rights of all Americans, particularly some of the most vulnerable members of our society. I am an attorney in the Division's Special Litigation Section, which is responsible for enforcing the Civil Rights of Institutionalized Persons Act (CRIPA), 42 U.S.C. § 1997. Under CRIPA, my office can investigate conditions of confinement in correctional facilities where it is alleged that prisoners are being deprived of their constitutional rights pursuant to a pattern or practice of resistance to the full enjoyment of those rights. Where such a pattern or practice of deprivations exists, the Department may initiate a civil action in the name of the United States against state or local officials to remedy unconstitutional conditions of confinement.

Please note, however, that the Special Litigation Section does not have the authority to directly assist individuals with resolving their personal grievances. Moreover, we are not authorized to seek relief for, or to represent, a specific person. The Special Litigation Section is, therefore, unable to provide you with legal opinions or legal assistance.

I hope this information is helpful. Please do not hesitate to contact this office if we may provide additional assistance regarding this, or any other matter.

Sincerely,

Anika Gzifa
Trial Attorney
Civil Rights Division

Washington, Blendean E.

From: Jones, Chunga
Sent: Monday, December 29, 2014 8:49 AM
To: Washington, Blendean E.
Subject: FW: Jack Wilson 44582

Good Morning,
Ms. Washington will you please advise the offender. See email below.
Thanks

From: Perry, Gloria
Sent: Monday, December 22, 2014 11:58 AM
To: Jones, Chunga; Gregory, Dennis
Cc: Holman, Linda
Subject: RE: Jack Wilson 44582

Inmate Wilson is convicted of a sex crime. He is not eligible for conditional medical release because of the sex crime conviction according to State law.

From: Jones, Chunga
Sent: Monday, December 22, 2014 11:48 AM
To: Gregory, Dennis
Cc: Perry, Gloria; Holman, Linda
Subject: Jack Wilson 44582

Good Afternoon,
Please advise if the following offender is eligible for medical release due the following illnesses: asbestosis, mesothelioma and a large gallstone in his gallbladder. Wherein, the offender states in a written letter that he is not being treated for any of the illnesses listed above. Your assistance in this matter is greatly appreciated.

Thanks
Chunga L. Jones
Constituent Services Representative
Mississippi Department of Corrections
csjones@mdoc.state.ms.us
Phone: (601) 359-5279
Fax: (601) 359-5293



RECEIVED

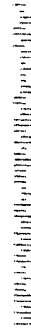
MAY 02 2016

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF MISSISSIPPI

United States District Court
Northern District

~~301 Commerce St.~~
Aberdeen, Mississippi

39730-0904



Jack B. Walker # 44582
UNIT - 26 - A - B-Zone - Bed 104
PARCHMAN MS 38738

MISSISSIPPI STATE PENITENTIARY
INMATE LEGAL ASSISTANCE PROGRAM
POST OFFICE BOX 10
PARCHMAN, MS 38738

PAVE POSTAGE PAID
INMATE LEGAL MAIL
MISSISSIPPI STATE PENITENTIARY
PARCHMAN MS 38738
THE ENCLOSED LETTER HAS NOT BEEN OPENED
OR INSPECTED IF THE WRITER ENCLOSED ANY
MATERIAL NOT PERTAINING TO LEGAL BUSINESS OR
ADDRESS CORRESPONDENCE FOR FORWARDING TO
THE ADDRESS LISTED ABOVE ATTACH THE ENCL.